

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BONNIE VERBURG,

Plaintiff,

-against-

SCHOLASTIC INC.,

Defendant.

Case No. 1:19-cv-10837-JGK

**STIPULATION AND [PROPOSED]
ORDER TO AMEND THE FIRST
AMENDED COMPLAINT**

JOHN G. KOELTL
UNITED STATES DISTRICT JUDGE

WHEREAS, plaintiff commenced this action by filing a complaint in this matter, and on or about March 19, 2020, the Court granted Plaintiff's motion to amend the complaint; and

WHEREAS, plaintiff, pursuant to Fed. R. Civ. P. 15(a), seeks to amend the first amended complaint; and

WHEREAS, Defendant does not object to Plaintiff filing her proposed second amended complaint pursuant to Fed. R. Civ. P. 15(a), which states that amendments should be freely given, and expressly reserves all rights and defenses;

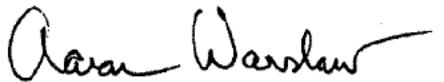
IT IS HEREBY STIPULATED AND AGREED that Plaintiff shall be permitted to file the proposed second amended complaint.

DATED: New York, New York
June 3, 2020



Rishi Bhandari

MANDEL BHANDARI LLP
80 Pine Street, 33rd Floor
New York, NY 10005
T: (212) 269-5600
F: (646) 964-6667
rb@mandelbhandari.com
Attorneys for Plaintiff Bonnie Verburg



Aaron Warshaw

OGLETREE, DEAKINS, NASH
SMOAK & STEWART, LLP
599 Lexington Avenue, Suite 1700
New York, NY 10022
T: (212) 492-2500
F: (212) 492-2501
aaron.warshaw@ogletree.com
Attorneys for Defendant

SO ORDERED:

/s/ John G. Koeltl June 4, 2020

HON. JOHN G. KOELTL
U.S.D.J.

43054574.2